

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BUFFALO PATENTS, LLC,

Plaintiff,

v.

MOTOROLA MOBILITY LLC,

Defendant.

Case No.: 1:22-cv-00621

APPENDIX A – PROPOSED SCHEDULE

Date	Item
Monday, May 23, 2022	Initial disclosures (LPR 2.1)
Monday, May 23, 2022	Fact discovery opens (LPR 1.3)
Monday, June 6, 2022	Initial Infringement Contentions (LPR 2.2)
Monday, June 20, 2022	Initial Non-Infringement, Unenforceability, and Invalidity Contentions (LPR 2.3) & Document Production (LPR 2.4)
Thursday July 7, 2022	Initial Response to Non-Infringement and Invalidity Contentions (LPR 2.5)
Monday, August 15, 2022	Deadline to Amend Pleadings and/or Join Parties.
Monday, October 17, 2022	List of Asserted Claims (LPR 3.1(a)(1))
Monday, October 31, 2022	Final Infringement Contentions (LPR 3.1(a)(2))
Monday, October 31, 2022	Final Unenforceability and Invalidity Contentions (LPR 3.1(b)) & Document Production (LPR 3.3)
Monday, December 5, 2022	Final Non-infringement Contentions (LPR 3.2)
Monday, December 5, 2022	Final Enforceability and Validity Contentions (LPR 3.2)
Monday, December 12, 2022	Parties to Exchange Claim Terms to Be Construed Along with Proposed Constructions (LPR 4.1(a))
Monday, December 19, 2022	Parties to Meet and Confer (LPR 4.1(b))
Thursday, January 19, 2023	Opening Claim Construction Brief by Party Opposing Infringement (LPR 4.2(a))
Thursday, January 19, 2023	Joint Appendix (LPR 4.2(b))

Wednesday February 15, 2022	Responsive Claim Construction Brief by Party Claiming Infringement (LPR 4.2(c))
Wednesday March 1, 2023	Reply Claim Construction (LPR 4.2(d))
Wednesday March 8, 2023	Joint Claim Construction Chart (LPR 4.2(f))
Wednesday March 22, 2023	Exchange Claim Construction Exhibits (LPR 4.3)
Wednesday March 29, 2023	<i>MARKMAN</i> HEARING (LPR 4.3) (<i>exact date to be determined based on Court's schedule</i>)
TBD	Court's Claim Construction Ruling
TBD (<i>42 days after Claim Construction Ruling</i>)	Close of Fact Discovery (LPR 1.3)
TBD (<i>28 days after Close of Fact Discovery</i>)	Initial Expert Witness Disclosures (LPR 5.1(b))
TBD (<i>28 days after initial expert reports</i>)	Rebuttal Expert Witness Disclosures (LPR 5.1(c))
TBD (<i>28 days after rebuttal reports</i>)	Completion of Expert Witness Depositions (LPR 5.2)
TBD	Close of Expert Discovery
TBD (<i>28 days after close of expert discovery</i>)	Dispositive Motion Deadline (LPR 6.1)
TBD (<i>45 days before Trial</i>)	Submit Witness Lists, Designations of Witnesses, and Exhibit Lists
TBD	Final Pretrial Conference
TBD	TRIAL (<i>exact date to be determined based on Court's schedule</i>)